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9 The Board of Trustees of The Leland Stanford Junior
10 University

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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

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15 The Board of Trustees of The Leland Stanford
16 Junior University,

17 Plaintiff,
18 v.

19 Stanford Financial Group Company and Stanford
20 Group Company,

21 Defendants.

22 No. 3:08-cv-04950 CRB

23 **STIPULATION AND [PROPOSED]
24 ORDER EXTENDING TIME TO
25 RESPOND TO DEFENDANT
26 STANFORD GROUP COMPANY'S
27 COUNTERCLAIMS**

28 Existing Date: May 8, 2009

29 Stipulated Date: June 12, 2009

30 Hon. Charles R. Breyer

31 Pursuant to Civil L.R. 7-7(a) and the Court's Standing Order, all parties to this action, by
32 and through their respective counsel or record, hereby stipulate as follows:

33 On February 13, 2009, Defendant Stanford Group Company filed a document containing
34 six counterclaims against Plaintiff Stanford University ("Stanford"). Document No. 78. After
35 the Northern District of Texas entered an order freezing the assets of Defendants Stanford
36 Financial Group Company and Stanford Group Company (the "Defendants") and appointed a
37 Receiver to exercise control and possession of the Defendants' assets (the "Receiver"), on
38 February 24, 2009 the Court entered an order granting the parties' request to extend Stanford's
39 time to respond to Stanford Group Company's counterclaims to May 8, 2009. Document No. 87

40 Since that order was entered, Stanford and the Receiver have engaged in settlement

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44 DEFENDANT STANFORD GROUP COMPANY'S COUNTERCLAIMS**

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1 discussions and are working to finalize a resolution of this action. While the parties have been
2 working diligently to reach a resolution, it is unlikely that a final agreement can be reached
3 before the May 8, 2009 deadline for Stanford's response to Defendant Stanford Group
4 Company's counterclaims. To provide the parties time to resolve their disputes, Stanford and the
5 Receiver wish to extend the time for Stanford to respond to Stanford Group Company's
6 counterclaims to June 12, 2009. Further, the parties wish to extend the time for the Defendants
7 to respond to pending discovery requests from May 4, 2009 to June 5, 2009.

8 NOW THEREFORE, IT IS SO STIPULATED between the parties that there is good
9 cause for the Court to enter an order extending the time for Stanford to respond to Stanford
10 Group Company's counterclaims from May 8, 2009 to June 12, 2009.

11 IT IS FURTHER STIPULATED that the time for the Defendants to respond to pending
12 discovery requests is extended from May 4, 2009 to June 5, 2009.

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14 DATED: April 30, 2009

15 Bingham McCutchen LLP
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18 By: /s/ William F. Abrams
19 William F. Abrams
Bingham McCutchen LLP
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21 Attorneys for Plaintiff
The Board of Trustees of The Leland
Stanford Junior University
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1 DATED: April 30, 2009

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3 Thompson & Knight LLP
4

5 By: /s/ Jessica B. Magee
6 Jessica B. Magee
Thompson & Knight, LLP

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8 Attorneys for the Receiver for Defendants
9 Stanford Financial Group Company and
Stanford Group Company

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1 **NOW THEREFORE, IT IS HEREBY ORDERED THAT** the time for Stanford to
2 respond to Defendant Stanford Group Company's counterclaims is extended from May 8, 2009
3 to June 12, 2009.

4 **IT IS FURTHER ORDERED** that the time for the Defendants to respond to pending
5 discovery requests is extended from May 4, 2009 to June 5, 2009.

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8 DATED: May 4, 2009

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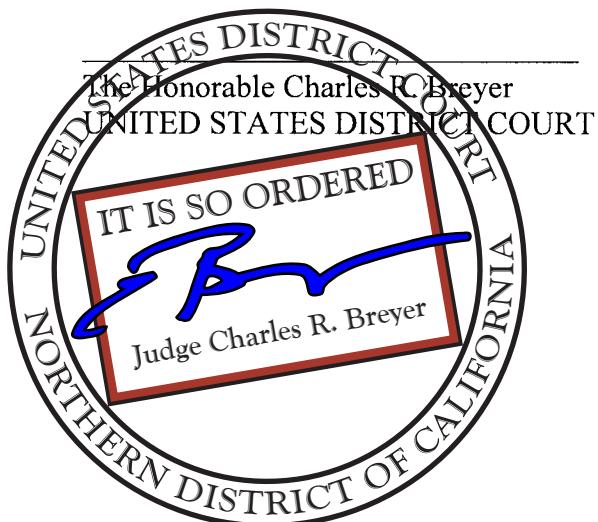
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1 **PROOF OF SERVICE**

2 I hereby certify that on April 30, 2009, I caused a true and correct copy of the document
3 entitled STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO
4 DEFENDANT STANFORD GROUP COMPANY'S COUNTERCLAIMS, to be electronically
5 filed in accordance with Civil L.R. 5-5(b) and General Order No. 45. Accordingly, all counsel of
6 record who are deemed to have consented to electronic service were served with true and correct
7 copies of the above documents via the Court's CM/ECF system. All counsel of record not
8 deemed to have consented to electronic service were served with a true and correct copy of the
9 above document via U.S. Mail, addressed as follows:

10 Ralph Janvey, Esq.
11 Krage & Janvey, LLP
12 2100 Ross Avenue, Suite 2600
13 Dallas, TX 75201
14 214-969-7500 (phone)
15 (RECEIVER)

16 Jessica B. Magee, Esq.
17 Thompson & Knight, LLP
18 One Arts Plaza
19 1722 Routh Street
20 Suite 1500
21 Dallas, TX 75201
22 214-969-1539 (phone)
23 (COUNSEL FOR RECEIVER)

24 DATED: April 30, 2009

25 /s/ William F. Abrams

26 William F. Abrams